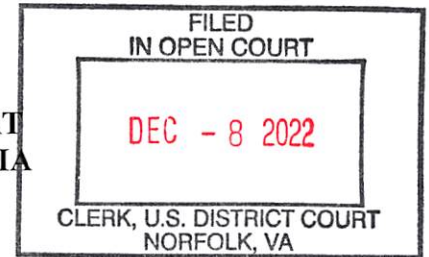


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division



IN RE:

GRAND JURY PROCEEDINGS

)
)
)

UNDER SEAL

CASE NO. 2:22cr 151

MOTION TO SEAL INDICTMENT

The United States of America, by and through its attorneys, Jessica D. Aber, United States Attorney for the Eastern District of Virginia, and William B. Jackson, Assistant United States Attorney, pursuant to Local Criminal Rule 49(B) moves to seal the indictment and arrest warrants when they are issued in this case.

Sealing is necessary to avoid notification of the existence of the indictment and arrest warrants which could result in the destruction of or tampering with evidence, the intimidation of potential witnesses, jeopardize the safety of the arresting officers or otherwise jeopardize the investigation. Another procedure will not adequately protect the needs of law enforcement at this time.

Such sealing is within the discretion of this Court and may be granted “for any legitimate prosecutorial need.” *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986); *see also*, *Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989).

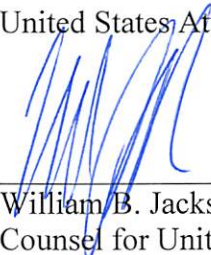
The United States requests that the indictment and arrest warrants remain under seal until the arrest of the defendant, at which time the indictment may be treated as a matter of public record.

The United States further requests that: (1) a certified copy of the indictment be provided to those law enforcement officials involved in the prosecution of the case; and (2) a copy of the sealed arrest warrants be made available to law enforcement officials for execution.

Respectfully submitted,

Jessica D. Aber
United States Attorney

By:



William B. Jackson, Assistant U.S. Attorney
Counsel for United States of America
United States Attorney's Office
101 West Main Street, Suite 8000
Norfolk, VA 23510
Phone: (757) 441-6331
Fax: (757) 441-6689
Email: William.jackson3@usdoj.gov